

ATTACHMENT B-1: PLAINTIFF'S PROPOSED GENERAL VOIR DIRE QUESTIONS

1. If a company learns that its product is injuring people or causing death, what do you expect the company to do?
2. This is a case involving a medical device. There are many medical devices on the market such as pacemakers and defibrillators. The medical device in this case is what is known as an IVC (inferior vena cava) filter. The device is implanted to prevent blood clots from traveling to the lungs or heart. Do you know anything about IVC filters? If so, please tell us about that.
3. Have you or anyone close to you had an IVC (Inferior Vena Cava) filter implanted? If so, please tell us about that.
4. Have you or anyone close to you worked in the medical device industry? If so, please tell us about that.
5. Do you or anyone close to you have any training or job experience in the public relations industry? If so, please tell us about that.
6. Do you or anyone close to you have any medical training or job experience? If so, please tell us about that.
7. Do you or anyone close to you have any legal training or job experience? If so, please tell us about that.
8. Do you or anyone close to you have any engineering training or job experience? If so, please tell us about that.

9. In this case, Ms. Coker is suing C. R. Bard for injuries that she says were caused by Bard's IVC filter. For any reason, do you believe that in a case like this that it would be difficult for you to be fair to either side? If so, please explain.
10. Have you ever been a manager, supervisor or director of any type of business or company, regardless of size? If so, please explain.
11. Has anyone ever been a foreperson of a jury before?
12. Do you know any of the defense attorneys (Richard North, Elizabeth ("Kate") Helm, James ("Jim") Rogers) in this case or any employee at Nelson Mullins Riley & Scarborough?
13. Have you or anyone close to you ever had a claim or lawsuit filed against you? If so, please explain.
14. Have you or anyone close to been diagnosed with a pulmonary embolism? Please identify the person and tell us about the situation and outcome.